

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

UNITED FOOD AND COMMERCIAL
WORKERS UNION, LOCAL No. 663, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
AGRICULTURE,

Defendant.

Case No. 18-cv-2660 (JNE/TNL)

DECLARATION OF ELIZABETH BELL

I, Elizabeth Bell, declare as follows:

1. My name is Elizabeth Bell. I currently work boxing products at the Smithfield meatpacking and processing facility in Tar Heel, North Carolina. Before that I worked on the loin line and on the cut floor.
2. Since approximately 2010, I have been a member of the United Food and Commercial Workers Union (UFCW) Local 1208.
3. Since August 2019, I have been a union steward. In that capacity, I handle grievances and members complaints.
4. UFCW Local 1208 represents more than 3,600 workers at the Smithfield plant.
5. As part of my job on the loin line, I would skin fat off loins on a conveyor belt using a spinning blade that is plugged into an outlet. Because the line is running so quickly I would cut every other or every third loin.
6. Before the loin line, I worked on the cut floor for nine years. I did a variety of tasks using a straight knife and a dry knife.
7. I have been injured on the line.

8. I cut chilled meat with a circular blade. When the lines run faster, I barely have time to sharpen my knife. Without a sharp blade, the meat is tougher to cut and requires more physical force. When the lines go faster, there is more pressure on my back, feet and hands.

9. I have had medical treatment for carpal tunnel syndrome. The company's doctor told me that my hand was permanently damaged and the company moved me off the cut floor to a different line boxing product.

10. I have seen my coworkers get injured because the lines are running so quickly.

11. On some lines they have people standing side-by-side. Because they are afraid of missing hams and getting in trouble, workers reach around each other with sharp knives. I have seen a number of injuries because people are moving so fast to keep up with the line speeds.

12. I have seen USDA inspectors stop the line when a worker is injured in the past, or in order to stop a worker from being injured. They have to stop the line when people get injured because people bleed on the line.

13. In August 2019, the plant added a new ham line. It has had the most issues in the whole department and the most injuries. Management put a lot of new people on that line and they are always going to the clinic saying the work is killing their hands.

14. I believe my and others' injuries are directly related to increased line speeds. In my time at Smithfield, I have grown increasingly concerned about a risk of injury to myself while working on the line. In my experience, I know that when line speeds are increased, more workers are injured.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.
Executed on 6-03-2020.


